

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America  
v.  
Miguel Sahid PINA-Martinez

Case No.

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 18, 2019 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*  
18 USC 1546

*Offense Description*  
Whoever knowingly utters, uses, attempts to use, possesses, obtains, accepts, or receives any such visa, permit, border crossing card, alien registration receipt card, or other document prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, knowing it to be forged, counterfeited, altered, or falsely made, or to have been procured by means of any false claim or statement, or to have been otherwise procured by fraud or unlawfully obtained.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet.

/S/Joshua Steele

*Complainant's signature*

Joshua Steele, Border Patrol Agent

*Printed name and title*

Sworn to before me and signed in my presence,

Date: December 20, 2019

*Judge's signature*

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

In support of Criminal Complaint

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****V.**

Miguel Sahid PINA-Martinez

Case Number:

On December 18, 2019, a Border Patrol Agent (BPA), encountered Miguel Sahid PINA-Martinez on board a commercial Greyhound bus at the United States Border Patrol Checkpoint located at the 29-mile marker of Interstate Highway 35 (IH-35), north of Laredo, Texas, in Webb County. The BPA proceeded to conduct an immigration inspection on PINA-Martinez who presented a Permanent Resident (LAPR) card bearing his name and picture. BPA noticed the picture on the card appeared to not be original to the card; specifically with regards to the size of the picture on the card. The picture on the LAPR card appeared to be larger than normal. The BPA also noticed the printing of the top label (Permanent Resident Card) did not appear authentic. The BPA asked PINA-Martinez if he had any other forms of identification or documents to affirm his identity to which he replied "no". During the immigration inspection, the BPA noticed PINA-Martinez become very nervous and he began to look around the bus, attempting to avoid making eye contact with him. At this point, the BPA escorted PINA-Martinez off the bus for further questioning regarding his immigration status. After further questioning, PINA-Martinez admitted that the LAPR card had been altered to reflect his information and picture and did not belong to him. PINA-Martinez freely admitted to being a citizen of Mexico with no legal right to enter or remain in the United States.

PINA-Martinez was placed under arrest and subsequently advised of his rights.

While conducting a search incident to arrest, a Mexican voter card was found in his possession. The voter card was found to be authentic, confirming his citizenship as Mexican. PINA-Martinez requested legal counsel before any questioning. No sworn statement was given by PINA-Martinez.

SUBSCRIBED and SWORN to before me on

20th

day of

December, 2019\_\_\_\_\_  
Signature of Judicial Officer\_\_\_\_\_  
/S/ Steele, Joshua Border Patrol Agent\_\_\_\_\_  
Signature of Complainant